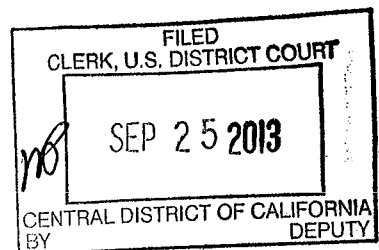


1 LECIA L. SHORTER
 2 287 S. ROBERTSON BLVD., STE 291
 3 BEVERLY HILLS, CA 90211
 4 (310) 869-5835
 5 leciashorter@yahoo.com



6 Plaintiff in Pro Per

7 **UNITED STATES DISTRICT COURT**
 8 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

9 LECIA L. SHORTER,

10 Plaintiff,

11 vs.

12 LEROY BACA, GLORIA MOLINA, MARK

13 RIDLEY-THOMAS, ZEV YAROSLAVSKY,

14 DON KNABE, MICHAEL D.

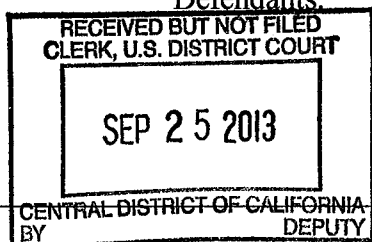
15 ANTONOVICH, DEPUTY SHERIFF

16 AVALOS, DEPUTY SHERIFF ORTIZ, the

17 COUNTY OF LOS ANGELES and, Does 1

18 through 25, inclusive,

19 Defendants.



Case No.: CV 12-07337-JVS-(AGR)

NOTICE OF MOTION AND MOTION OF
 PLAINTIFF LECIAL L. SHORTER'S
 MOTION TO COMPEL FURTHER
 DISCOVERY RESPONSES FROM
 DEFENDANTS COUNTY OF LOS
 ANGELES AND LEROY BACA

DATE: OCTOBER 29, 2013

TIME: 10:00 A.M

PLACE: COURTOOM B

Judge: Hon. Alicia G. Rosenberg

Discovery cut off: September 6, 2013

Pre-trial Conference: TBD

Trial date: TBD

23 **TO DEFENDANTS LEROY BACA AND COUNTY OF LOS ANGELES AND THEIR**
 24 **ATTORNEYS OF RECORD:**

25 **PLEASE TAKE NOTICE** that on October 29, 2013, at 10:00 a.m. in Courtroom B,
 26 8th Floor of the United States District Court, located at 312 N. Spring Street, Los Angeles,
 27
 28

1 California, Plaintiff LECIA L. SHORTER will move the court for an order to compel Defendants
2 LEROY BACA and COUNTY OF LOS ANGELES to provide further and complete responses
3 to Plaintiff's Interrogatories and Request for Production of Documents, pursuant to Federal
4 Rules of Civil Procedure, Rule 37. Plaintiff also seeks an order to compel Defendants to provide
5 adequate and complete Rule 26 Disclosures.

6 This motion is based upon this Notice; the Joint Stipulation of the parties and
7 Declaration of Lecia L. Shorter filed concurrently herewith, and upon all exhibits
8 attached hereto. This motion is also based upon such evidence, oral or documentary, as is
9 presented at the hearing on said motion.

10
11 **MEET AND CONFER**

12 The parties met and conferred in person prior to the filing of this motion on September 5,
13 2013. Plaintiff also made numerous attempts toward informal resolution via correspondence
14 prior to actually conferencing with counsel for Defendants.

15
16
17 DATED: September 24, 2013

18 
19 LECIA L. SHORTER
20 Plaintiff In Pro Per
21
22
23
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25
26
27
28

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service of the attached document, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 287 S. Robertson Blvd., No. 291, Beverly Hills, CA 90211.

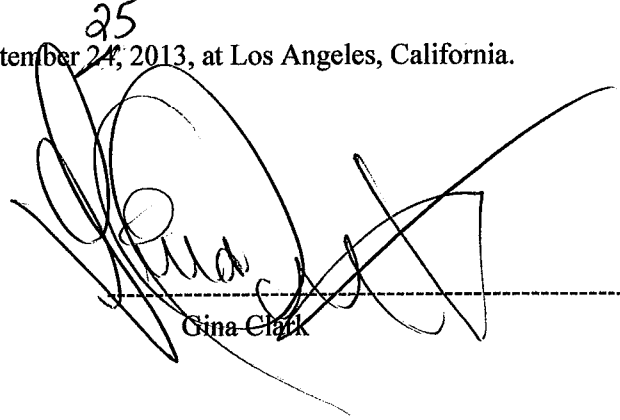
On September ²⁵24, 2013, I served the following document(s) described as **NOTICE OF MOTION AND MOTION OF PLAINTIFF LECIA L. SHORTER TO COMPEL FURTHER DISCOVERY RESPONSES FROM DEFENDANTS LEROY BACA AND COUNTY OF LOS ANGELES** on the interested parties in this action as follows:

Rina Mathevosian, Esq.
Nelson & Fulton
3435 Wilshire Boulevard, Suite 2800
Los Angeles, CA 90010-2014

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing by depositing the sealed envelope with the United States Postal Service with postage prepaid.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on September ²⁵24, 2013, at Los Angeles, California.


Gina Clark